



# Florida Department of Environmental Protection

Southwest District Office  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926

Rick Scott  
Governor

Jennifer Carroll  
Lt. Governor

Herschel T. Vinyard Jr.  
Secretary

## FINAL PERMIT

### PERMITTEE

Lantmannen Unibake USA, Inc.  
1927 4th Avenue South  
St. Petersburg, Florida 33712-1302

Air Permit No. 1030518-007-AO  
Permit Expires: 01/31/2018  
Minor Air Operation Permit  
Project Name: Operation Permit Renewal

Authorized Representative:  
Mr. David Leibensperger  
Safety & Regulatory Manager

This is the final permit to renew Air Operation Permit No. 1030518-006-AF for the baking operation at the Lantmannen Unibake USA, Inc. facility (Standard Industrial Classification No. 2051). The facility is located in Pinellas County at 1927 4th Avenue South in St. Petersburg, Florida. The UTM coordinates are Zone 17, 336.45 km East, and 3072.60 km North.

This final permit is organized by the following sections:

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Unit Specific Conditions
- Section 4. Appendices

Due to the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of final permit. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of final permit, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval

of the presiding officer upon the filing of a motion in compliance with rule 28-106.205 of the Florida Administrative Code.

All petitions filed under these rules shall contain:

- (a) The name and address of each agency affected and each agency's file or identification number, if known;
- (b) The name, address, and telephone number of the petitioner; the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
- (c) A statement of when and how the petitioner received notice of the agency decision;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action;
- (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and
- (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by rule 28-106.301 of the Florida Administrative Code.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

Any party to this order has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.



## SECTION 1. GENERAL INFORMATION (FINAL)

### FACILITY AND PROJECT DESCRIPTION

#### Existing Facility

This facility produces a variety of frozen baked artisan products, which includes a variety of breads and rolls. The product starts as a mixture of miscellaneous ingredients comprised primarily of white flour and water. Various ingredients, including yeast, are then added to produce the dough. The dough then goes through various stages in the process including molding, proofing, slicing, baking, cooling, freezing and then packaging. All finished products are then stored in the warehouse freezer awaiting shipping to various customers throughout the United States.

This facility includes three flour silos, three baking lines for yeast-based products and two exempt boilers housed in an approximately 55,000 square feet building. The three baking lines include two Mecatherm lines and a Rheon line.

Operations at this facility also include the following activities:

- (1) Racks of baked bread are cooled after they have been removed from the ovens by forcing air across the bread and through a vent to the outside of the building. The process removes heat from the racks of bread and is not of source of air pollution.
- (2) In addition to the standard products, the facility also bakes seeded breads and breads containing cheese ingredients. During the baking of these products, the potential for visible emissions from oven vents (exceeding the facility wide opacity limit of less than 20 %) exists. To reduce visible emissions below the facility wide opacity limit, the facility may utilize exit blowers that will add sufficient volumes of air to the oven vents. The use of baking pans with special surface coatings (parchment paper, silicone coated) may also allow the production of these special products with acceptable visible emissions.

The existing facility consists of the following emissions units.

Facility ID No. 1030518	
EU ID No.	Emission Unit Description
001	Baking Line #1 (Mecatherm Line)
002	Baking Line #2 (Rheon Line)
004	Three Flour Storage Silos
005	Baking Line #4 (Mecatherm Line)

**NOTE:** Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.

## SECTION 1. GENERAL INFORMATION (FINAL)

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### Exempt Emission Units/Activities

The facility's three Aldrich boilers and 24 natural gas burners are exempt from permitting pursuant to the "Categorical and Conditional Exemptions" of Rule 62-210.300(3)(a)33., F.A.C. The exempt boilers and burners are described below.

- Three Aldrich boilers (model number DG 280 SC) fired with natural gas. The heat input capacity is 315,000 BTU/hour for each boiler and 0.95 MMBtu/hour for the three combined.
- Eight natural gas burners used in the Mecatherm oven and described in E.U. ID. No. 001. The heat input capacity of the eight burners combined is 1.27 MMBtu/hour.
- 10 natural gas burners used in the Rheon oven and described in E.U. ID. No. 002. The heat input capacity of the 10 burners combined is 3.24 MMBtu/hour.
- Six natural gas burners used in the Mecatherm oven and described in E.U. ID. No. 005. The heat input capacity of the six burners combined is 4.17 MMBtu/hour.

### FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAPs).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a synthetic non-Title V source for the pollutant VOC. The emissions limitations in this permit will ensure that the facility's VOC emissions will be below the threshold for a Title V source.

### PERMIT HISTORY/AFFECTED PERMITS

This permit replaces Operation Permit No. 1030518-006-AF

## SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

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1. Permitting Authority - The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Air Resource Management Section. The Southwest District's mailing address and phone number is:

Florida Department of Environmental Protection  
Southwest District Office  
Air Resource Management Section  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926  
Telephone: 813-632-7600

All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority - All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Pinellas County Air Quality Division (PCAQD). The PCAQD mailing address and phone number is:

Pinellas County Air Quality Division  
509 East Avenue South, Suite 138  
Clearwater, Florida 33760  
Telephone: 727-464-4422

3. Appendices - The following Appendices are attached as part of this permit:

- a. Appendix A. Citation Formats and Glossary of Common Terms;
- b. Appendix B. General Conditions;
- c. Appendix C. Common Conditions; and
- d. Appendix D. Common Testing Requirements.

4. Applicable Regulations, Forms and Application Procedures - Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions - For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.

[Rule 62-4.080, F.A.C.]

6. Modifications - Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.

[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

## SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

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7. Annual Operating Report - On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.  
[Rule 62-210.370(3), F.A.C.]
8. Objectionable Odor - No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. An objectionable odor is any odor present in the outdoor atmosphere that by itself or in combination with other odors is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.  
[Rules 62-296.320(2) and 62-210.200, Definitions-(Objectionable Odors), F.A.C.; Pinellas County Code Subsection 58-178]
9. Special Compliance Test - If the Department and/or PCAQD, after investigation, have good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department and the PCAQD.  
[Rule 62-297.310(7)(b), F.A.C.]
10. Operation Permit Renewal Application - A completed application for renewal of the operation permit shall be submitted to the Permitting Authority with a copy to PCAQD (Compliance Authority) no later than 60 days prior to the expiration date of the operation permit. To properly apply for an operation permit, the applicant shall submit the following:
- the appropriate permit application form (*see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: <http://www.dep.state.fl.us/air/>*);
  - the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.;
  - copies of the most recent month of records specified in Specific Condition No. A.3.; and
  - any proposed revisions to the most recently approved O & M Plan.
- [Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

**SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)**

**A. EU Nos. 001, 002 & 005 - Baking Lines**

This section of the permit addresses the following emissions units (EUs).

EUID No.	Emission Unit Description
001	<p><u>Baking Line #1 (Mecatherm Line):</u>                      This emissions unit consists of the Mecatherm Line which is a continuous non-stop baking line with a bread production capacity of 1.1023 tons/hour and 9,656 tons/year. The Mecatherm line includes molding, proofing, slicing, baking (one oven), cooling, and freezing with very little labor involved. The line works on the principle of conveyor movement from station to station as bread or rolls are packaged and moved to the freezer.</p> <p>This Mecatherm Line has one oven equipped with 8 exempt natural gas burners. Each burner has a heat input rating of 0.1587 MMBTU/hour for a total design heat input rating of 1.270 MMBtu/hour. Pollutants generated by this emission unit include VOCs generated from fermentation using yeast in the bread production process and the products of combustion resulting from the use of natural gas burners.</p>
002	<p><u>Baking Line #2 (Rheon Line):</u>                      This emissions unit consists of the Rheon Line which is a continuous feed, no stress operation with a bread production capacity of 0.8819 tons/hour and 7,725 tons/year. The Rheon itself is a stand-alone piece of equipment and is used only in the make-up and molding of dough. The dough is then placed on a baking pan and the pan is then placed into the baking rack. The rack is then manually moved to the proof box. When the product has proofed, the rack is manually rolled into a rack oven. This emission unit has 10 of these rack ovens manufactured by Werner &amp; Pfleiderer Company of Germany. Once the rack containing bread dough is placed in an oven, the bread is baked for approximately 15-30 minutes depending on the product. When the bread has finished baking, the rack is removed from the oven where it is allowed to cool prior to being frozen. From the Rheon freezer, the bread or rolls are packaged and moved to the storage freezer.</p> <p>The Rheon Line is equipped with 10 rack ovens and 10 exempt natural gas burners. Each burner has a heat input rating of 0.3242 MMBTU/hour for a total design heat input rating of 3.242 MMBtu/hour. Pollutants generated by this emission unit include VOCs generated from fermentation using yeast in the bread production process and the products of combustion resulting from the use of natural gas burners.</p>
005	<p><u>Baking Line #4 (Mecatherm Oven):</u>                      This emission unit consists of a "Mecatherm" oven with a bread production capacity of 2.2046 tons/hour and 19,312 tons/year.</p> <p>The Mecatherm Oven has 6 exempt natural gas burners with a total design heat input rate of 4.167 MMBtu/hours. Pollutants generated by this emission unit include volatile organic compounds (VOCs) generated from fermentation using yeast in the bread production process and the products of combustion resulting from the use of natural gas burners.</p>

**SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)**

**A. EU Nos. 001, 002 & 005 - Baking Lines**

**PERFORMANCE RESTRICTIONS**

**A.1. Operational Hours** - The hours of operation are not limited (8760 hours per year).  
[Rules 62-4.070(3) and 62-210.200 (Definition of Potential to Emit), F.A.C.]

**EMISSIONS STANDARDS**

**A.2. VOC Emissions Standard** – VOC emissions from emission units 001, 002, and 005 shall not exceed the following limit:

E.U. ID No.	Annual VOC Emissions (Any consecutive 12-month period)
001	19.3 tons
002	15.5 tons
005	38.6 tons

[Rule 62-210.200 (Definition of Potential to Emit), F.A.C.; FESOP Permit No. 1030518-001-AF and Construction Permit No. 1030518-003-AC]

**RECORDS AND REPORTS**

**A.3. Monthly Log** - The permittee shall maintain appropriate records to document compliance with the VOC emission limits of Specific Condition No. A.2. The records shall include, but are not limited to, the following:

- a. Facility Name, Facility Number (1030518), Emission Unit Numbers (001, 002, 005), Month, Year;
- b. For each emission unit (001, 002, 005);
  - 1. The total quantity of bread produced (in tons) for the month;
  - 2. The calculated quantity of VOCs emitted (in pounds or tons) for the month as follows;

<b>VOC Emissions Equation</b>
VOCs emitted = Tons of bread produced x VOC Emission Factor*

*\*VOC Emission Factor = 4 pounds of VOCs / ton of baked bread*

- 3. The sum of VOCs emitted (in tons) for the most recent consecutive 12-month period.

*Permitting Note: The VOC emission factor was determined based upon use of the equation below (ref: EPA document number 453/R-02-017, Alternative Control Technology Document for Bakery Oven Emissions, 12/92) and the worst case parameters supplied by the applicant in the revised permit application dated 4/23/2007.*

$$\text{VOC Emission Factor} = 0.95Y_i + 0.195t_i - 0.51S - 0.86t_s + 1.90$$

Where:

VOC E.F. = pounds VOC per ton of baked bread

## SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

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### A. EU Nos. 001, 002 & 005 - Baking Lines

$Y_i$	= initial baker's percent of yeast to the nearest tenth of a percent
$t_i$	= total yeast action time in hours to the nearest tenth of an hour
$S$	= final (spike) baker's percent of yeast to the nearest tenth of a percent
$t_s$	= spiking time in hours to the nearest tenth of an hour

[Rule 62-4.070(3), F.A.C.; FESOP Permit No. 1030518-001-AF and Construction Permit No. 1030518-003-AC]

- A.4.** Records Retention - Monthly records shall be completed by the end of the following month. All records required by this permit shall be maintained at the facility for at least three years, unless otherwise noted, and be made available to the Department and/or PCAQD for inspection upon request.

[Rule 62-4.160(14)(b), F.A.C.]

**SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)**

**B. EU No. 004 - Flour Storage Silos**

This section of the permit addresses the following emissions unit (EU).

EUID No.	Emission Unit Description
004	<p><u>Three Flour Storage Silos:</u></p> <p>This emission unit consists of three flour storage silos. Flour is pneumatically loaded from trucks into the flour silos where it is stored. The combined annual throughput for the three silos is indirectly limited (by the combined throughput capacity of the ovens due to the nature of the process) to 22,933 tons/year.</p> <p>Silos #1, #2 and 3 each have a storage capacity of approximately 84,000 pounds and a maximum loading rate of 33.3 tons/hour. Silo #1 is equipped with a WAM GmbH, FPVT 9 12 baghouse, Silo # 2 is equipped with a WAM GmbH, FNXC3J22V baghouse, and Silo #3 is equipped with a WAM GmbH, FNXC9J22ZC2160 baghouse.</p>

**PERFORMANCE RESTRICTIONS**

**B.1. Operational Hours** - The hours of operation are not limited (8760 hours per year).  
[Rules 62-4.070(3) and 62-210.200 (Definition of Potential to Emit), F.A.C.]

**RECORDS AND REPORTS**

**B.2. Operations and Maintenance (O&M) Plan** - The permittee shall comply with the O&M Plan submitted with the permit renewal application dated December 20, 2012. The O&M Plan may be amended with the prior approval of the PCAQD. Records of inspections, maintenance, and performance data of control devices and auxiliary equipment shall be retained for a minimum of three (3) years and shall be made available to the Compliance Authority (PCAQD) upon request. At a minimum, the O&M Plan shall include (where applicable):

- a. The operating parameters of the pollution control device.
- b. Timetable for the routing maintenance of the pollution control device as specified by the manufacturer.
- c. Timetable for routine periodic observations of the pollution control device sufficient to ensure proper operations.
- d. A list of the type and quantity of the required spare parts for the pollution control device, which are stored on the premises of the permit applicant.
- e. A record log which will indicate, at a minimum:
  - 1. When maintenance and observations were performed.
  - 2. What maintenance and observations were performed.
  - 3. Who performed said maintenance and observations.
  - 4. Acceptable parameter ranges for each operational check.

[Rule 62-4.070(3), F.A.C. and Pinellas County Code, Section 58-128]